

1 Plaintiff Prager University and Defendants Google LLC and YouTube, LLC.
2 (collectively, “the parties”), by and through their respective counsel of record, hereby stipulate as
3 follows:

4 WHEREAS, Plaintiff filed this action on October 23, 2017;

5 WHEREAS, Defendants were served on October 30, 2017 and have until November 20,
6 2017 to answer or otherwise respond to Plaintiff’s Complaint (see Dkts. 12 and 13);

7 WHEREAS, Defendants expect to respond to the Complaint by moving to dismiss;

8 WHEREAS, Plaintiff expects to move for a preliminary injunction on some of its claims;

9 WHEREAS, Defendants have requested and Plaintiff has consented to extending the
10 deadline for Defendants to answer or otherwise respond to the Complaint to December 29, 2017;

11 WHEREAS, subject to Court approval, the parties have also agreed to a briefing schedule
12 for subsequent briefs related to Defendants’ motion to dismiss and Plaintiff’s motion for a
13 preliminary injunction;

14 WHEREAS, extending the deadline for Defendants to answer or otherwise respond to the
15 Complaint to December 29, 2017 and setting the other deadlines as set forth below will not alter
16 the date of any event or any deadline already fixed by Court order;

17 WHEREAS, the parties currently have an Initial Case Management Conference in this
18 action scheduled for January 24, 2018 (Dkt. 7);

19 NOW, THEREFORE, based on the above stipulation, pursuant to Civil Local Rules 6-2
20 and 7-12, and with Defendants and Plaintiff reserving all rights and defenses, the parties
21 respectfully ask the Court to enter the attached proposed order, which provides that:

22 1. Defendants shall have until December 29, 2017 to answer or otherwise respond to
23 Plaintiff’s Complaint;

24 2. Plaintiff shall have until December 29, 2017 to file its Motion for a Preliminary
25 Injunction;

26 3. Plaintiff shall have until February 9, 2017 to file papers in opposition to any motion
27 to dismiss and Defendants shall have until February 9, 2017 to file papers in opposition to
28 Plaintiff’s Motion for a Preliminary Injunction;

1 4. Defendants shall have until February 23, 2017 to file reply papers in further support
2 of any motion to dismiss and Plaintiff shall have until February 23, 2017 to file reply papers in
3 further support of its Motion for a Preliminary Injunction;

4 5. Defendants and Plaintiff shall seek to notice the hearings on their respective
5 motions to dismiss and for a preliminary injunction at the same time, on the first available date
6 after briefing has concluded;

7 6. The dates set for the initial Case Management Conference (currently scheduled for
8 January 24, 2018), and the Joint Case Management Statement (currently due January 17, 2018),
9 are vacated; and

10 7. The Court will reschedule the initial Case Management Conference following
11 rulings on Defendant's anticipated motion to dismiss and/or Plaintiff's Motion for a Preliminary
12 Injunction.

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14 Dated: November 8, 2017

Respectfully submitted,

15 WILSON SONSINI GOODRICH & ROSATI
16 Professional Corporation

17 By: /s/ David H. Kramer

18 DAVID H. KRAMER

19 Attorneys for Defendant
GOOGLE LLC and YOUTUBE, LLC.

20
21 Dated: November 8, 2017

Respectfully submitted,

22 BROWNE GEORGE ROSS LLP

23
24 By: /s/ Peter Obstler

PETER OBSTLER

25 Attorneys for Plaintiff
26 PRAGER UNIVERSITY
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1 Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that
2 concurrence in the filing of the document has been obtained from each of the other Signatories.

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4 /s/ David H. Kramer
5 DAVID H. KRAMER
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